

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 05-30020-MAP
)	
EDDIE SANTIAGO,)	
Defendant)	

GOVERNMENT'S OBJECTION TO DEFENDANT'S
MOTION FOR DOWNWARD DEPARTURE

The United States, by and through it's undersigned attorneys, objects to the Defendant's Motion for Downward Departure and Variance from the United States Sentencing Guidelines. The government relies on the following.

The defendant moves for a downward departure and/or variance from the sentencing guideline range of 210 to 262 months. The government objects and moves for a sentence within the established range. The defendant relies primarily on the difficult circumstances of the defendant's childhood as supported by the report of Dr. Howard Lester. However, the defendant committed the offense of conviction when he was 26 years old and after having been involved in the criminal justice system on numerous occasions including two periods of incarceration. Because of the significant time which had elapsed between the defendant's childhood and the commission of the offense of conviction, the Court should deny the request for a downward

departure or variance and sentence the defendant within the applicable sentencing guideline range.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Todd E. Newhouse
TODD E. NEWHOUSE
Assistant U.S. Attorney

Certificate of Service

I hereby certify that on August 30, 2007, this Notice of Appeal filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Todd E. Newhouse
TODD E. NEWHOUSE
Assistant U.S. Attorney